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7 *Attorney for Petitioner,*

8 *Zachary Kueker*

9 **UNITED STATES DISTRICT COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**

11
12 IN RE: DMCA SECTION 512(h)
13 SUBPOENA TO GOOGLE, LLC
14 D/B/A YOUTUBE

Case No. 25-cv-80179

15 **DECLARATION OF ZACHARY**
16 **KUEKER IN SUPPORT OF**
17 **REQUEST TO THE CLERK FOR**
18 **ISSUANCE OF SUBPOENA TO**
19 **GOOGLE, LLC D/B/A YOUTUBE**
20 **PURSUANT TO 17 U.S.C. § 512(h), TO**
21 **IDENTIFY ALLEGED INFRINGER**

DECLARATION OF ZACHARY KUEKER

I, Zachary Kueker, declare as follows:

1. I am an individual residing in the State of Florida. I am the operator of the YouTube channel known as Liberty Troll (https://www.youtube.com/@Liberty_Troll).

2. I submit this declaration in support of my request for issuance of a subpoena to Google, LLC d/b/a YouTube ("YouTube"), pursuant to the Digital Millennium Copyright Act ("DMCA"), 17 U.S.C. § 512(h) (the "DMCA Subpoena"). The purpose of the DMCA Subpoena is to identify the alleged infringer or infringers who posted substantial portions of my audio-visual work on the YouTube channel <https://www.youtube.com/@FrauditorRoundup> without my authorization, which posting infringes on my copyright (the "Infringing Content"). I have personal knowledge of the facts contained herein and, if called upon to do so, I could and would testify competently thereto.

3. On April 23, 2025, I submitted a DMCA notification, via YouTube's online DMCA notification form, identifying the Infringing Content on YouTube's platform and providing the information required by 17 U.S.C. § 512(c)(3)(A). Attached hereto as Exhibit 1 is a true and correct copy of the email reflecting the information I submitted through YouTube's online form, along with YouTube's response to the DMCA notification.

4. The purpose for which the DMCA Subpoena is sought is to obtain the identity of the alleged infringer or infringers, and such information will only be used for the purpose of protecting my rights under 17 U.S.C. §§ 100, *et seq.*

I declare under penalty of perjury under the laws of the State of Florida and the United States of America that the foregoing is true and correct.

Executed on July 5, 2025 at Celebration, Florida.



Zachary Kueker

EXHIBIT 1

Gmail - Fwd: [LQYPAQK2LRGURF7FOY3TEL4P3U] YouTube Copyright Complaint Submission



Fwd: [LQYPAQK2LRGURF7FOY3TEL4P3U] YouTube Copyright Complaint Submission

1 message

----- Forwarded message -----

From: **YouTube Copyright** <youtube-disputes+2l20blozzwi7s07@google.com>

Date: Wed, Apr 23, 2025 at 11:58 PM

Subject: [LQYPAQK2LRGURF7FOY3TEL4P3U] YouTube Copyright Complaint Submission

To: <zkueker88@gmail.com>



Copyright Infringement Notification Confirmation

Thank you for your submission. It is under review to ensure it is valid and includes all [required elements](#). We will reply to this email when we've taken action on your request. You can also check on the status of your takedown request in the '[Removal requests](#)' tab which is found in the Copyright section of your channel.

Here is the information you filled in:

- Copyright Owner Name (Company Name if applicable): Zachary Kueker
- Your Full Legal Name (Aliases, usernames or initials not accepted): Zachary Kueker
- Your Title or Job Position (What is your authority to make this complaint?): my own content
- Address:
 - [235-303 Goldenrain Dr.](#)
 - [Celebration, FL 34747](#)
 - [US](#)
- Username: Zach
- Email Address: zkueker88@gmail.com
- Phone: (407) 488-6546
- URL of allegedly infringing video to be removed: <https://www.youtube.com/watch?v=EFi9QmEQhfk>
- Describe the work allegedly infringed: My video
 - Source of video: Luc-G3354E0
 - Type of video: Internet video
 - Where does the content appear?
The content appears in the targeted video from 0:02:59 to 0:14:47 :
<https://www.youtube.com/watch?v=EFi9QmEQhfk&t=179>
It appears in your source video: <https://www.youtube.com/watch?v=Luc-G3354E0>
- Country where copyright applies: US
- I state UNDER PENALTY OF PERJURY that:

Gmail - Fwd: [LQYPAQK2LRGURF7FOY3TEL4P3U] YouTube Copyright Complaint Submission

- I am the owner, or an agent authorized to act on behalf of the owner of an exclusive right that is allegedly infringed.
- I have a good faith belief that the use of the material in the manner complained of is not authorized by the copyright owner, its agent, or the law; and
- This notification is accurate.
- I acknowledge that under Section 512(f) of the DMCA any person who knowingly materially misrepresents that material or activity is infringing may be subject to liability for damages.
- I understand that abuse of this tool will result in termination of my YouTube channel.
- Authorized Signature: Zachary Kueker

- The YouTube Team

[Help Center](#) • [Email Options](#)

You received this email to provide information and updates around your YouTube channel or account.



© 2021 [Google LLC d/b/a YouTube](#), 901 Cherry Ave, San Bruno, CA 94066

On Apr 24, 2025 zkueker88@gmail.com wrote:

Video IDs: EFI9QmEQhfk

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My Best,

Zach Kueker